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Attorneys for Counter-Defendant
Nelson Martinez, solely in his individual capacity

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NELSON MARTINEZ,

Plaintiff,

v.

ISM CONNECT, LLC, F/K/A DATA
TRANSFER, LLC,

Defendant.

ISM CONNECT, LLC F/K/A DATA
TRANSFER, LLC,

Counter-Claimant,

v.

NELSON MARTINEZ,

Counter-Defendant.

Case No.: 2:17-cv-02905-GMN-GWF

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO
RESPOND TO FIRST AMENDED
COUNTERCLAIMS
(First Request)**

NELSON MARTINEZ, in his individual capacity,

Third-Party Plaintiff,

v.

JEFFREY HUTCHINS, RALPH C. OLSEN,
MARK DEL VECCHIO, and KURT
BOROWSKY,

Third-Party Defendants.

WHEREAS Defendant/Counterclaim-Plaintiff ISM CONNECT, LLC f/k/a DATA TRANSFER, LLC (“ISM Connect”) filed its First Amended Counterclaims (“Counterclaim”) on July 2, 2018 (ECF No. 62) against Counter-Defendant NELSON MARTINEZ, in his individual capacity (“Individual Martinez”) and in his capacity as the representative for the former members of Ingenuity Sun Media, LLC (“Representative Martinez”) (together “Martinez”);

WHEREAS the deadline for Martinez to respond to ISM Connect’s Counterclaim is currently July 16, 2018;

WHEREAS this is the first request for Martinez to respond to ISM Connect’s Counterclaim and good cause exists for this extension as the parties are currently engaged in settlement negotiations that they anticipate could alleviate the need for any response to be filed;

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the named parties hereto, that the time for Martinez to respond to ISM Connect’s Counterclaim is now extended to August 15, 2018.

Dated this 16th day of July, 2018.

Dated this 16th day of July, 2018.

BALLARD SPAHR LLP

FABIAN VANCOTT

/s/ Joel E. Tasca

/s/ Kevin N. Anderson

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*Attorneys for Nelson Martinez, solely in his in
his capacity as the representative for the
former members of Ingenuity Sun Media, LLC*

7 *Attorneys for ISM Connect, LLC, F/K/A Data
8 Transfer, LLC*

9 Dated this 16th day of July, 2018.

10 **SANTORO WHITMIRE**

11 /s/ Oliver J. Pancheri

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19 *Attorneys for Nelson Martinez, solely in his in
20 his individual capacity*

21 **IT IS SO ORDERED:**

22 

23 UNITED STATES MAGISTRATE JUDGE

24 Date: 7-17-2018